

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PARETEUM SECURITIES LITIGATION

Case No. 1:19-cv-09767-AKH-GWG

UNOPPOSED MOTION TO STAY FURTHER PROCEEDINGS

Defendant Pareteum Corporation moves this Court for an order staying further proceedings, including remaining Scheduling Order deadlines and hearings related to the same, but excluding settlement-related motion practice as to Defendant Squar Milner, LLP. Lead Plaintiff does not oppose this relief. Pareteum is filing a request for the same stay in *Sabby Volatility Warrant Master Fund, Ltd. v. Pareteum Corp., et al.*, No. 19-cv-10460 (S.D.N.Y.), which the plaintiff in that case also does not oppose.

This Court's "power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants," with the "basic goal" being "to avoid prejudice" to the parties. *Delgado v. NJ Transit Rail Operations, Inc.*, 329 F.R.D. 506, 507-08 (S.D.N.Y. 2019) (granting motion to stay all proceedings). A stay is merited here because of (1) ongoing government investigation related to the subject matter of this litigation, and (2) the precarious financial status of Pareteum, which has been exploring a range of strategic alternatives to address ongoing liquidity constraints. *See Parker v. Dawson*, No. 06-CV-6191 JFB WDW, 2007 WL 2462677, at *4 (E.D.N.Y. Aug. 27, 2007) (granting stay of all proceedings due to ongoing government investigation).

The parties have been engaged in mediation to try to resolve this litigation but have been hampered by the two factors referenced above. The parties believe that a stay of this action will help to preserve scarce resources, including liability insurance assets, while the parties await further clarity on ongoing government investigation and the financial condition of Pareteum.

As noted above, Lead Plaintiff does not oppose this relief. Additionally, Individual Defendants Robert H. Turner, Edward O'Donnell, Victor Bozzo, and Denis McCarthy, Defendant Squar Milner, LLP, and Defendant Dawson James Securities, Inc. do not oppose this Motion. The parties will report to the Court on the status of this matter within ninety (90) days of entry of an Order staying the proceedings.

Dated: February 4, 2022

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TO: Counsel of Record (Via ECF)